

**UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

NATIONAL LABOR RELATIONS BOARD \*

Petitioner,

v.

RETRO ENVIRONMENTAL, INC. \*  
and GREEN JOBWORKS, LLC. \*

Respondents. \*

Case No. 18-2513

\* \* \* \* \*

**RESPONDENT GREEN JOBWORKS, LLC'S  
ANSWER TO APPLICATION FOR ENFORCEMENT OF AN ORDER OF  
THE NATIONAL LABOR RELATIONS BOARD**

Green JobWorks, LLC, as a Respondent in the above-captioned case, hereby answers the Application for Enforcement filed by the National Labor Relations Board (herein "Board") with respect to its Decision and Order (herein "Order") issued on March 26, 2018 and reported at 366 NLRB No. 45, and states as follows:

Green JobWorks admits that this Court has jurisdiction over the Board's application pursuant to Section 10(e) of the National Labor Relations Act, as amended, 29 U.S.C. § 160(e).

Green JobWorks admits that venue in this Court is proper as the alleged unfair labor practices occurred in several locations, including Maryland.

Green JobWorks further states that it has complied with the Board's Order since the time this Court enforced the underlying test of certification case in Case No. 18-1245.

WHEREFORE, Green JobWorks requests that the Court deny enforcement of the Order in this case until such time as Green JobWorks is alleged to have violated the Order since the issuance of the Court's Order in the certification case.

Dated: January 14, 2019.

Respectfully submitted,

/s/ Patrick John Stewart

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#### CERIFICATE OF SERVICE

I hereby certify that on January 14, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system and the same was served on all parties or their counsel of record through the CM/ECF system.

/s/ Patrick John Stewart

Patrick John Stewart